

Kevin Haas (Attorney ID No. 28261987)
Marianne May (Attorney ID No. 047031997)
Luke Barlow (Attorney ID No. 238992018)
CLYDE & CO US LLP
340 Mt. Kemble Ave.
Suite 300
Morristown, New Jersey 07960
(973) 210-6700
Attorneys for Defendant, ACE American Insurance Company

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

FORMOSA PLASTICS CORPORATION,
U.S.A. and FORMOSA PLASTICS
CORPORATION, Texas,

Plaintiffs,

v.

ACE AMERICAN INSURANCE COMPANY,

Defendant.

Case No. 2:20-cv-14338-BRM-JSA

**NOTICE OF MOTION FOR
SUMMARY JUDGMENT**

**ORAL ARGUMENT
REQUESTED**

Motion Date: February 5, 2024

PLEASE TAKE NOTICE that in reliance upon the attached declaration of Kevin M. Haas dated November 30, 2023, the attached Memorandum of Law, and the attached Statement of Uncontested Material Facts, Defendant ACE American Insurance Company will move this Court before the Honorable Brian R. Martinotti, U.S.D.J., in the United States Courthouse, 50 Walnut Street, Newark, New Jersey 07101, on the day of February 5, 2024 at 10:00 a.m., or as soon thereafter as counsel can be heard, for an order pursuant to Rule 56 of the Federal Rules of Civil Procedure granting Defendant's motion for summary judgment.

Dated: November 30, 2023

CLYDE & CO US LLP

/s/ Kevin M. Haas

Kevin M. Haas

Marianne G. May

Luke T. Barlow

340 Mt. Kemble Ave., Suite 300

Morristown, NJ 07960

Phone: (973) 210-6700

Fax: (973) 210-6701

Email: kevin.haas@clydeco.us

Email: marianne.may@clydeco.us

Email: luke.barlow@clydeco.us

*Counsel for Defendant ACE Insurance
Company*

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of November 2023, pursuant to this Court's Text Order dated October 27, 2023 (ECF No. 79), I will serve the foregoing *Notice of Motion For Summary Judgment* via electronic mail to counsel for Plaintiffs as follows:

Aaron Coombs, Esquire
Pillsbury Winthrop Shaw Pittman, LLP
1200 17th St. NW
Washington, DC 20017
Phone: (202) 663-9200
Email – aaron.coombs@pillsburylaw.com

Matthew D. Stockwell
Pillsbury Winthrop Shaw Pittman, LLP
31 West 52nd Street
New York, NY 10019
Phone: (212) 858-1075
Email – matthew.stockwell@pillsburylaw.com

Counsel for Plaintiffs

/s/ Luke T. Barlow

Luke T. Barlow